

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
FORMAN HOLT 365 West Passaic Street, Suite 400 Rochelle Park, NJ 07662 Telephone: (201) 845-1000 Attorneys for Charles M. Forman, Chapter 7 Trustee Kimberly J. Salomon, Esq. ksalomon@formanlaw.com	
In Re: ROBERT F. CONKLIN, SR., Debtor.	Chapter: 7 Case No.: 21-12535 (VFP) Judge: Hon. Vincent F. Papalia

APPLICATION FOR ORDER SHORTENING TIME

The applicant, Charles M. Forman, chapter 7 trustee (the “Trustee”) for the estate of Robert F. Conklin, Sr. (the “Debtor”), through his attorneys, Forman Holt, requests that the time period for notice of the *Trustee’s Motion (1) Authorizing the Sale of Real Property; (2) Directing Occupants to Vacate Property; (3) Authorizing Payment of Commission to Real Estate Agents; (4) Authorizing Payment to Quicken Loans on Account of Its Secured Claim, and (5) Authorizing Payment of Co-Owner’s Interest and Related Closing Costs*, (the “Motion”) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1) for the reason(s) set forth below:

1. A shortened time hearing is requested because: The Contract of Sale for the Debtor’s property located at 121 Athenia Avenue, Clifton, New Jersey (the “Property”) provides for the closing to take place on or before August 1, 2022. The prospective purchasers are unable to extend the closing date because they sold their home and are in a use and occupancy agreement for their current residence which cannot be extended. The Debtor and his

non-filing spouse, Joyce Conklin, have agreed to vacate the Property as of July 1, 2022. However, in the event they do not, the Trustee seeks the entry of an order directing them to vacate the Property and turn over the keys to the Trustee no later than July 15, 2022, to avoid any potential delay to the closing of sale.

2. State the hearing dates requested: Wednesday, July 6, 2022, at 10:00 a.m.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

4. Fed. R. Bankr. P. 2002(a) requires the Clerk of the Court to serve notice by mail upon all known creditors and other parties-in-interest of a proposed sale of assets outside of the ordinary course of business. Because the Trustee is seeking approval of the sale of the Property on shortened time, the Trustee respectfully submits that service by the Clerk of a Notice of Proposed Private Sale is not required consistent with D.N.J. LBR 6004-1(c).

5. The Trustee respectfully requests that the Court enter an order shortening the time period for notice and authorizing the Trustee to serve the Motion and all related pleadings by first class mail upon parties entitled to receive notice under Fed. R. Bankr. P. 2002.

FORMAN HOLT
Attorneys for the Trustee

By: /s/ Kimberly J. Salomon
Kimberly J. Salomon

Dated: June 22, 2022